

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
RAS Citron, LLC 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 470-321-7112 Attorneys For Secured Creditor	CASE NO.: 20-15557-MBK CHAPTER 13 Objection to Confirmation of Debtor's Chapter 13 Plan
In Re: Tracey L. Gladden, Debtor.	

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

Deutsche Bank National Trust Company, As Trustee For Morgan Stanley ABS Capital I Inc. Trust 2006-HE8 Mortgage Pass-Through Certificates, Series 2006-HE8 ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE # 2), and states as follows:

1. Debtor, Tracey L. Gladden, ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on April 14, 2020.
2. Secured Creditor holds a security interest in the Debtor's real property located at 118 Wildflower Place, Delran, NJ 08075, by virtue of a Mortgage recorded on September 25, 2006 in Book 11124 at Page 378. Said Mortgage secures a Note in the amount of \$139,200.00.
3. The Debtor filed a Chapter 13 Plan on April 14, 2020.
4. The Plan fails to include treatment of Secured Creditor's claim, nor is the subject property and claim listed in Debtor's Petition. Secured Creditor objects to the Plan and seeks clarification as to Debtor's intentions in regard to the subject property and claim.
5. The Plan fails to include payments toward the arrears owed on the Note and Mortgage with Secured Creditor. It is anticipated that Secured Creditor's claim will show the

pre-petition arrearage due Secured Creditor is approximately \$1,849.80. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed. Secured Creditor objects to any plan which proposes to pay it anything less than \$1,849.80, subject to the final figures in the anticipated proof of claim, as the pre-petition arrearage over the life of the plan.

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

RAS Citron, LLC
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Fairfield, NJ 07004
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CERTIFICATION OF SERVICE

1. I, Aleisha C. Jennings, represent Deutsche Bank National Trust Company, As Trustee For Morgan Stanley ABS Capital I Inc. Trust 2006-HE8 Mortgage Pass-Through Certificates, Series 2006-HE8 in this matter.
2. On April 29, 2020, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below: Objection to Confirmation of Debtor's Chapter 13 Plan
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

April 29, 2020

RAS Citron, LLC
Attorney for Secured Creditor
130 Clinton Road, Suite 202
Fairfield, NJ 07004
Telephone Number 470-321-7112

By: /s/Aleisha C. Jennings
Aleisha C. Jennings, Esquire
NJ Bar Number AJ-2114
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<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
Brad J. Sadek Sadek and Cooper 1315 Walnut Street Ste 502 Philadelphia, PA 19107	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
Tracey L. Gladden 7 River Lane Delanco, NJ 0807	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853	Standing Chapter 13 Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)